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17 **Pro Hac Vice Forthcoming*

18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 Melinda Adkins, et al.,

21 Plaintiffs,

22 v.

23 Union Pacific Railroad Company, et al.,

24 Defendants.

No. 2:21-cv-01818-APG-VCF

**JOINT MOTION AND
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT (First
Request)**

1 Defendants CalNev Pipe Line, LLC; Kinder Morgan Pipeline, LLC; Kinder Morgan
2 Energy Partners, L.P.; and Kinder Morgan, Inc. (collectively, “Kinder Morgan”), and all
3 Plaintiffs, through undersigned counsel, jointly stipulate and request that Kinder Morgan
4 may have an extension of time, through October 18, 2021, to answer or otherwise respond
5 to Plaintiffs’ complaint.

6 Plaintiffs filed their First Amended Complaint in state court on September 16, 2021.
7 Because the First Amended Complaint made substantial changes and added dozens of
8 additional plaintiffs, the parties agreed that Kinder Morgan would have until October 18,
9 2021 to respond. On September 30, 2021, before Kinder Morgan had responded to the
10 complaint, Defendants Monsanto Company, Pharmacia LLC, and Solutia Inc. removed the
11 case to this Court. Plaintiffs and Kinder Morgan stipulate that the agreed-upon deadline of
12 October 18, 2021 remains appropriate and necessary to allow Kinder Morgan sufficient
13 time to respond to the complaint’s allegations. This is the parties’ first request for such an
14 extension of time to respond to the complaint, and the parties certify that the request is not
15 made for any improper purpose.

1 Dated: October 5, 2021

2 **MUELLER & ASSOCIATES, INC. PERKINS COIE LLP**

3 By: /s/ Lindsay A. Dibler
4 Lindsay A. Dibler
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14 *Morgan Energy Partners, L.P. and Kinder*
15 *Morgan, Inc.*

16 **Pro Hac Vice Forthcoming*

17 IT IS SO ORDERED.



18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 10-6-2021

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2021, I electronically transmitted the attached documents to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants including:

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